

1 ROBERT K. PHILLIPS, ESQ.
Nevada Bar No. 11441
2 TIMOTHY D. KUHLs, ESQ.
Nevada Bar No. 13362
3 MATTHEW B. BECKSTEAD, ESQ.
Nevada Bar No. 14168
4 **PHILLIPS, SPALLAS & ANGSTADT, LLC**
5 504 South Ninth Street
Las Vegas, Nevada 89101
6 (702) 938-1510
7 (702) 938-1511 (Facsimile)
rphillips@psalaw.net
8 tkuhs@psalaw.net
mbeckstead@psalaw.net
9

10 *Attorneys for Defendant*
Walmart, Inc.

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 WENDI BRUCE,

14 Plaintiff,

15 v.

16 WALMART, INC., a foreign corporation d/b/a
WALMART; DOES I through X, inclusive;
17 ROE CLEANING COMPANY; ROE REPAIR
COMPANY; and ROE CORPORATIONS I
18 through X, inclusive,

19 Defendants.
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Case No.: 2:21-cv-00534-RFB-DJA

STIPULATION TO EXTEND
DISCOVERY DEADLINES

(FIRST REQUEST)

21 COMES NOW, Defendant WALMART, INC., (hereinafter "Defendant") by and through its
22 counsel of record, the law firm of PHILLIPS, SPALLAS & ANGSTADT, LLC, and Plaintiff WENDI
23 BRUCE (hereinafter "Plaintiff") (collectively, the "Parties"), by and through his counsel of record, the
24 law firm of DEEVER | CRAFTON LAW FIRM, having conducted a Rule 26(f) conference via
25 telephone on April 15, 2021, hereby stipulate to extend the discovery deadlines and seek this Honorable
26 Court's order according with the following terms, pursuant to LR IA 6-1 and LR 26-3:

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1 needed to reach a stipulated agreement on a protective order or confirm that the Parties will be unable
2 to do so and proceed with motion practice regarding the same. Additionally, Defendant and Plaintiff are
3 working together to ensure that Defendant receives the necessary releases in support of subpoenas for
4 Plaintiff's records. Moreover, Plaintiff reserves the right to set a site inspection under Rule 34.

5 The Parties will be conducting depositions of the named parties, fact witnesses, treating
6 providers, and any expert witnesses who have yet to be disclosed.

7 **REASONS FOR REQUESTING AN EXTENSION OF DEADLINES**

8 The Parties have been diligently working to complete discovery in this matter. The Parties
9 anticipate that liability is going to be heavily disputed, warranting more time for the Parties to obtain
10 and review records, retain experts, obtain written reports, resolve any discovery disputes, conduct a
11 physical examination, conduct a site inspection, and analyze all of the foregoing to prepare for
12 dispositive-motion practice and/or trial. Moreover, the effects of COVID-19, while waning in effect,
13 still linger and, as this Honorable Court knows, law firms have experienced significant disruptions to
14 staff and attorneys (including measures such as arranging for staff to work remotely while maintaining
15 security), disruptions in the ability to quickly obtain adequate records, and a reduced ability conduct
16 discovery to the same extent as before the pandemic began. Also, Mr. Beckstead has been with Phillips,
17 Spallas & Angstadt for a couple of months and is still getting up to speed in this and other matters.
18 Accordingly, the Parties request a 120-day extension of the remaining deadlines in this matter, including
19 the deadline to amend pleadings and add Parties that is currently scheduled for June 30, 2021. The
20 Parties have communicated recently about this matter. The Parties believe the foregoing constitutes
21 good cause both to extend that deadline and for doing so within 21 days of the currently scheduled
22 deadline of June 30, 2021 for amending the pleadings and adding parties, while understanding that this
23 Honorable Court will insist on a speedy administration of this case and will not tolerate undue delays or
24 dilatory conduct.

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PROPOSED SCHEDULE TO COMPLETE REMAINING DISCOVERY

According to the Court's Stipulated Discovery Plan and Scheduling Order Under Rule 26(f) and LR 26-1(b) entered on April 28, 2021 [ECF NO. 12], the current deadlines are as follows:

1. Discovery Cut off Date: September 28, 2021
2. Deadline to Amend Pleadings and Add Parties: June 30, 2021
3. Deadline to Disclose Expert Witnesses: July 30, 2021
4. Deadline to Disclose Rebuttal Expert Witnesses: August 30, 2021
5. Dispositive-Motion Deadline: October 28, 2021
6. Filing Pretrial Order: November 29, 2021

The Parties hereby stipulate to the following new deadlines and ask the Court to allow the same:

1. Discovery Cut off Date: January 26, 2022
2. Deadline to Amend Pleadings and Add Parties: October 28, 2021
3. Deadline to Disclose Expert Witnesses: November 29, 2021
4. Deadline to Disclose Rebuttal Expert Witnesses: December 27, 2021
5. Dispositive-Motion Deadline: February 25, 2022
6. Filing Pretrial Order: March 21, 2022

DATED this 25th day of June, 2021.

DATED this 25th day of June, 2021.

/s/ Matthew B. Beckstead, Esq.

/s/ Brice Crafton, Esq.

ROBERT K. PHILLIPS, ESQ.
Nevada Bar No. 11441
MATTHEW B. BECKSTEAD, ESQ.
Nevada Bar No. 14168
PHILLIPS SPALLAS & ANGSTADT LLC
504 South Ninth Street
Las Vegas, Nevada 89101

BRICE CRAFTON, ESQ.
Nevada Bar No. 10558
DEAVER | CRAFTON
810 E. Charleston Boulevard
Las Vegas, NV 89104

Attorneys for Plaintiff

*Attorneys for Defendant
Walmart Inc.*

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: June 28, 2021